

BLANKROME

1271 Avenue of the Americas | New York, NY 10020
blankrome.com

Phone: (212) 885-5270
Fax: (917) 332-3795
Email: thomas.belknap@blankrome.com

February 14, 2023

FILED VIA ECF

Honorable Paul A. Crotty
United States District Court
500 Pearl Street
New York, NY 10007

Re: In re: Energetic Tank, Inc.
S.D.N.Y. 1:18-cv-01359 (PAC)

Dear Judge Crotty:

We represent Petitioner Energetic Tank Inc. in this matter. We write to respectfully request an order allowing Petitioner to file under seal certain documents related to the question of whether Claimants' recently filed declarations alleging domicile establish complete diversity in this matter.

In response to the Court's Order of January 23, 2023 (Dkt. 444) directing the parties to submit evidence supporting a finding of complete diversity, Petitioner would like to submit for the Court's consideration the "History of Assignments" extracted from the Official Military Personnel Files of Claimants Navin Ramdhum, Patrick Joseph, Jason Luangco, Victor Granados, Philip Torio, and Michael Wuest.

The said documents contain the Claimants' social security numbers and were designated "Privacy Act Record Confidential - Subject to Protective Order" at the time they were disclosed by the United States.

Petitioner moves for permission file the documents under seal only viewable by the Court and the parties, with redacted versions available for public viewing.

We thank the Court for its attention to this matter.

Respectfully submitted,
/s/ Thomas H. Belknap, Jr.
Thomas H. Belknap, Jr.

As ordered
Paul A. Crotty
2/12/23

Cc: All counsel (via ECF)